

## **PROCEDURE REQUESTS FOR CONSULTATIVE APPRAISAL OF BARE-HAND CONTACT PLANS**

As a courtesy to chain restaurants, our division agreed to provide the opportunity for informal appraisal of bare-hand contact plans that would be applied statewide. This procedure specifies the nature and scope of our appraisal and includes the following sections:

- Background on bare-hand contact plans
- Prerequisites a firm to submit a bare-hand contact plan
- Section review and response procedure
- Consultative appraisal checklist
- Required elements of our comment letters
- Worksheet for submission with bare-hand contact plans

### **References:**

- Michigan Food Law of 2000, Section 6151
- Food Code Annex 3, Section 3-301.11
- A Guide to Developing a Written Alternative Practice and Procedure for Bare-Hand Contact with Ready-To-Eat Foods

## **Background on Bare-Hand Contact Plans**

Food Code § 3-301.11(B) permits a retail food establishment to implement an alternative to the no bare-hand contact requirement under specified approved conditions. These approved conditions are stated in § 6151 of the Michigan Food Law of 2000 (MFL). The section 6151 prerequisites and requirements for implementing a bare-hand contact plan provide a HACCP-based approach to establish a system to control the principle hazard (i.e., fecal-oral transmission of foodborne pathogens) that is the target of the Food Code provision.

The Michigan Food Law of 2000 does not provide the Michigan Department of Agriculture with the authority to approve bare hand contact plans. Therefore, in no way should our communication indicate that our appraisal provides any form of approval. *Our informal appraisal merely provides consultative advice on the plan, but our review cannot include assessment of how the plan is applied, managed, or verified.*

## **Prerequisites to Review and Appraisal**

To avail themselves of our voluntary appraisal, a firm must do all of the following:

- ☐ The firm must be a chain restaurant operating statewide with uniform procedures.
- ☐ Their request is in writing from a responsible official of the chain's management.
- ☐ A completed "Worksheet -- Submission of a Bare-Hand Contact Plan" is submitted.
- ☐ All supporting documentation specified in the worksheet is submitted.

- ❑ The completed plan is submitted (see checklist).

## Section Review and Response Procedure

**Step 1.** Prior to beginning our appraisal of any materials, we will assess whether the prerequisites listed above are completed. If any of the prerequisites are missing in the submission, it is the section's general policy to notify the firm in writing.

**Step 2.** Once plan and other materials are received and determine to be complete, they will be reviewed using the following procedure:

1. The plans will be reviewed utilizing the checklist for consultative appraisal of bare-hand contact plans (see below), which was developed to evaluate whether or not the plan includes all of the items as specified in the Food Law of 2000, Section 6151, and is suitable for use.
2. The Worksheet submitted by the firm will be reviewed for accurate documentation of the specifics of the plan and whether items in the appraisal checklist are addressed.
3. Once the plan and completed worksheet have been reviewed, an informal comment letter documenting the results of the review, along with a copy (MDA keeps the original) of the completed worksheet with comments written directly on the worksheet will be sent to the firm submitting the plan.
4. If the plan is lacking information or is incomplete as specified by the letter and worksheet, then the firm submitting the plan should review the comment letter and worksheet, and rework the plan.
5. Re-submissions are not encouraged, as this is a voluntary consultative service, which takes time away from our mandatory functions.

## Consultative Appraisal Checklist

The bare-hand contact plan will be reviewed to see if each of the following elements are met:

- 1. Documents the firm's policy and procedure for determining that each individual establishment in the chain, prior to implementing the plan, meets the requirement for compliance with critical items of Food Code (1999) that are necessary for the implementation of bare-hand contact of ready-to-eat food?**
  - a) Is a provision for review and maintenance of copies of the last three (3) inspection reports at each establishment, which document compliance with critical items of the Food Code?
  - b) Is there policy and procedure for self-inspection of the establishment to evaluate compliance with the critical requirements of the Food Code?
  - c) Is there a procedure for ceasing bare-hand contact when the establishment is unable to meet the critical requirements of the Food Code necessary for the implementation of a bare-hand contact plan?
- 2. Identifies each ready-to-eat food item to be handled with bare hands.**
- 3. Identifies where in the recipe food will be handled with bare hands.**
  - a) Did they evaluate if a change in recipe would eliminate the need for bare hand contact?
- 4. Identifies what work station(s) will be involved.**
  - a) Did they evaluate specific workstation and equipment for impact on bare-hand contact?

- b) Did they evaluate adjacent workstation activities impact on bare hand contact workstation?
- c) Did they evaluate food flow impact on bare hand contact workstation?

**5. Evaluates alternatives to bare-hand contact.**

- a) Were alternatives were considered?
- b) Are specific reasons why the alternatives were judged to be impractical listed?
- c) Does the firm take into account if similar operation in other establishments are done with or without bare hand contact?
- d) Is there an evaluation of the methods of handling food?
- e) Is there an evaluation of obtaining food in another form, which would eliminate bare hand contact?
- f) Are there other alternatives that were not considered? [List]

**6. Lists employee title or position, which will handle food with, bare hands.**

- a) Assess the impact the employees other assigned duties will have on bare hand contact of the food
- b) Consider and account for situations when the bare hand contact employee does not report for work.

**7. Documents an employee food safety training program to include:**

- a) Proper hand wash techniques
- b) Hygienic food practices
- c) Safe food handling practices
- d) Knowledge of foodborne illness symptoms
- e) Importance of not working when ill

**8. Provides for a method of documenting existing and new employee's participation in and understanding of training program before bare hand contact with food.**

- a) Does the documentation list employees, trained by name, and date; including:
  - i. Providing for employee sign-off acknowledging understanding.
  - ii. Providing for acknowledgement by management of completion of training.

**9. Establishes a refresher food safety training program.**

- a) Do they establish a timetable when refresher training will be given to all employees who handle ready-to-eat food with bare hands?
- b) Do they establish a method of documenting when and to whom training is given?
- c) Do they provide for employee sign off acknowledging understanding?
- d) Do they provide for acknowledgment by management of completion of training?

**10. Provides for a method of monitoring and documenting employee on-the-job hand washing techniques and frequency.**

- a) Has the firm established easy-to-observe handsink locations as monitoring sites (not restrooms)?
- b) Has the firm established a monitoring frequency of hand washing. (Example: immediately prior to reporting to work station)?

**11. Contains a written corrective plan of action that will be taken when a bare food contact employee does not follow their bare hand contact plan or when foods or hands become contaminated.**

- a) Do they have documentation that assures the Corrective plan of action is carried out?
  - i. All possibly contaminated food thrown out.
  - ii. Employee retraining before further bare hand contact with food.
  - iii. Exclusion or restriction takes place as appropriate.
  - iv. Replacement with another trained employee.

**12. Provides for and document yearly update evaluation of the bare hand contact plan.**

- a) Do they have a provision to analyze changes in recipe or menu?
- b) Do they have a provision to analyze changes in industry techniques?
- c) Do they have a provision to analyze change in employee assignments and abilities?
- d) Renew self inspections and regulatory inspection reports and assess for the capability to consistently meet the control requirements of the Food Code.

**13. All necessary documents and materials specified above are readily available at each establishment for review and use.**

## **Required Elements in Informal Letters**

### **FORMAT**

Comment letters may vary in form, style, and content to provide the flexibility needed to comment on the materials submitted. Nevertheless, the elements listed below are common to all bare-hand contact plan appraisal letters:

Titled "INFORMAL COMMENT"

- 1. Issued by Allen Anderson.
- 2. Issued to the responsible official of the restaurant chain.
- 3. The dates of the appraisal.
- 4. A description of the materials reviewed.
- 5. Explanation of components that would be noncompliant with the Food Law of 2000. These comments should be brief, but in sufficient detail to provide permit the reader to take corrective action. Citation of the section of the law is not required.
- 6. List of recommendations.
- 7. Instruction that our informal comment does not constitute an approval.
- 8. A designated MDA staff to whom the response should be addressed.

### **DISTRIBUTION**

These letters should be distributed as follows:

- 1. Original - Addressee(s)
- 2. One copy (blind) each to:
  - Food Service Sanitation Section Manager
  - File

[date]

### INFORMAL COMMENT

[NAME OF SUBMITTER  
TITLE  
FIRM'S NAME (chain)  
ADDRESS]

Dear [Addressee]:

### **Re: Informal Appraisal of Your Proposed Bare-Hand Contact Plan**

Your firm's bare-hand contact plan, which you submitted was reviewed on \_\_\_\_\_, 2001. The materials submitted consisted of [insert brief description here].

Please be aware that the law does not provide the Michigan Department of Agriculture (MDA) with the authority to approve bare-hand contact plans. Therefore, in no way should this informal appraisal be considered an approval. This is simply an informal consultative advice on whether or not this plan includes all of the items as specified in the Food Law of 2000, section 6151 and is suitable for use.

Our appraisal of your plan indicated the following areas needs revision or additional information to comply with the Food Law of 2000:

1.

**[List of noncompliances appears here]**

You should not consider the above deficiencies as an all-inclusive list.

In addition, my appraisal includes the following recommendations:

- A. Each establishment is different and unique, and this must be considered so that the management can best and most effectively manage the bare-hand contact of ready-to-eat foods. This usually requires individual customized plans for each individual establishment, as necessary to take into account the differences in the workforce attitudes, intelligence, ability, and willingness to follow strict and demanding work guidelines and practices.
- B. The ability and willingness of management to properly manage their employees while handling foods with bare hands, and the ability and willingness to enforce the plans must also be taken into account.
- C.

**[List of other recommendations appears here]**

Our review cannot include assessment of how the plan is applied, managed, or verified. Therefore, this letter should not be construed as alleviating you of your responsibility for proper application and verification of the plan's effectiveness.

If you have any questions, please contact me at (517) 241-0934.

Enclosure: Worksheet copy

# Worksheet

Date received

## Submission of a Bare-Hand Contact Plan

The worksheet must be completed by a firm requesting voluntary consultative appraisal of a bare-hand contact plan.

For guidance on completion, refer to the attached documents:

- 1) Michigan Food Law of 2000 (Act No. 92 of 2000) Section 6151
- 2) Food Code, Annex 3, 3-301.11, Preventing Contamination from Hands
- 3) A Guide to Developing a Written Alternative Practice and Procedure for Bare-Hand Contact with Ready-to-Eat Foods

Owner/operator/establishment name \_\_\_\_\_

Establishment address \_\_\_\_\_

List all ready-to-eat foods that will be handled by employee bare hands \_\_\_\_\_

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1. Does the plan state why alternatives to bare-hand contact were determined to be impractical? What alternatives were considered? Were they listed? What were they?

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Why were these alternatives impractical in the facility? List specific reasons:

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Did the chain try alternative practices? ☐ Yes ☐ No

Are there other alternatives that they did not consider? ☐ Yes ☐ No List:

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2. Are the critical requirements necessary for the implementation of alternatives to Section 3-301.11 (B) of the Food Code demonstrated?

Is each facility required to maintain copies of the last three inspections that show and document consistent compliance with either the 1999 Food Code requirements or commensurate sections of previous laws? ☐ Yes ☐ No

Does the facility utilize self inspection to evaluate compliance with the critical requirements of the Food Code? ☐ Yes ☐ No

If critical problems were identified during the last three inspections, does the plan preclude approval or provide for procedures to cease no bare-hand contact? ☐ Yes ☐ No

3. Does the plan provide a documented food safety training program, and require it's implementation for all employees having contact with ready to eat foods, including, but not be limited to:

1. Proper handwashing practices and procedures. ☐ Yes ☐ No

2. The potential problems that exist with unsanitary hand washing practices? ☐ Yes ☐ No

3. Hygienic food practices and safe food preparation? ☐ Yes ☐ No

4. The reasons and importance of not working when ill or with any symptoms of foodborne illness? ☐ Yes ☐ No

5. The proper training and use of hand sanitizers? ☐ Yes ☐ No

4. Does the plan provide that periodic refresher programs be given and documented? ☐ Yes ☐ No

Examples of the types of training may include handouts, manuals, videos, etc. List types of refresher training and frequency of refresher training:

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5. Does the plan identify the specific workstations where ready-to-eat foods will be touched with bare hands? ☐ Yes ☐ No List Workstations \_\_\_\_\_

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6. Does the plan evaluate the proposed menu and identify each recipe where ready-to-eat foods will be handled with bare hands? ☐ Yes ☐ No

7. Does the plan determine which staff, and where bare-hand contact with ready-to-eat food occurs? ☐ Yes ☐ No

8. Does the plan identify each employee position that will handle ready-to-eat foods with their bare hands by title? ☐ Yes ☐ No

9. Does the plan provide and require a monitoring program to be in place to determine if the alternative policy is being followed? ☐ Yes ☐ No
10. Does the plan, monitoring program provide for readily observable locations to observe proper handwashing? ☐ Yes ☐ No
11. Does the plan provide a list of corrective actions, (such as employee retraining, discarding contaminated foods, using sanitary gloves, replacing an employee with another trained employee, excluding or restricting ill employees) to be done if employees are not following the established policy? ☐ Yes ☐ No

Monitoring should include the proper training for handwashing; and  
Training in the proper use of approved hand sanitizers or other preventative measures; and  
The use of monitoring methods to check employee activity concerning the alternative policy; this may include handwash logs, and/or automatic counters; and  
Documentation of the corrective actions taken.

12. Does the plan identify written policies that are needed for food or hands that become contaminated? List.

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13. Does the plan state that management will monitor employees to recognize the signs of diseases that may be transmittable through foods and the steps to take should this occur? ☐ Yes ☐ No

Describe monitoring procedures used and provide documentation of monitoring and corrective actions taken: \_\_\_\_\_

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14. Does the plan document updated changes that may occur in the alternative plan? ☐ Yes ☐ No

For example does the plan require the facility to review and update the alternative practice plan? ☐ Yes ☐ No

15. List when an update will occur to the alternative practice plan. An example may be quarterly, once a year, or anytime the recipe changes.

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## **Food Law of 2000 (Act No. 92 of 2000) Section 6151**

### **289.6151 Alternative practices and procedures; training; monitoring; review; identification; documentation; modification or suspension.**

Sec. 6151. (1) Prior to a license holder implementing alternative practices and procedures to section 3-301.11(B) of the food code, the license holder shall do all of the following:

- (a) Evaluate alternatives to bare-hand contact and determine them to be impractical.
- (b) Meet the critical requirements of the food code that are necessary for the implementation of alternatives to section 3-301.11(B) of the food code as allowed under this section.
- (c) Implement a documented food safety training program for all employees having bare-hand contact with ready-to-eat foods.
  - (2) The training program shall include, but not be limited to, the following areas:
    - (a) Proper hand washing practices and procedures including the potential problems that exist with unsanitary hand washing practices.
    - (b) Hygienic food practices and safe food preparation.
    - (c) The importance of not working when ill with any symptoms of foodborne illness.
  - (3) Training described under this section shall be given to new employees and periodic refresher training shall be given to any employee having bare-hand contact with ready-to-eat foods. The license holder shall document the training program.
  - (4) The license holder shall also implement a documented plan to periodically monitor employees to ensure that the practices and procedures established under this section are being followed and list the corrective actions that will be taken if employees are not following the practices and procedures established under this section.
  - (5) A license holder implementing alternative procedures and practices under this section shall periodically review its operations, verify the effectiveness of the alternative practices and procedures, and monitor when ready-to-eat foods are handled by its employees.
  - (6) Upon the request of the director, the license holder shall identify any ready-to-eat foods that will be contacted with bare hands, as well as the specific location and method for preparation.
  - (7) Documentation required under subsections (1)(c), (3), and (4) shall be readily available at the retail food establishment for use by the person in charge and review by the director.
  - (8) The documentation required under subsections (1)(c), (3), and (4) is not required to be approved by the director prior to implementation of alternatives to section 3-301.11(B) of the food code.
  - (9) The department shall provide guidance to retail food establishments on the documentation of alternatives to section 3-301.11(B) of the food code as required under this section.
  - (10) The department may require the modifications or suspension of existing alternative practices and procedures implemented under this section if the department determines that there is a threat to public health.

## Food Code, Annex 3, 3-301.11, Preventing Contamination from Hands

Refer to the public health reasons for ' ' 2-301.11, 2-301.12, and 2-301.13.

Even though bare hands should never contact exposed, ready-to-eat food, thorough handwashing is important in keeping gloves or other utensils from becoming vehicles for transferring microbes to the food.

### **Clarification of & 3-301.11(B) of the FDA Food Code with Respect to the Phrase "*Except...when otherwise APPROVED*"...**

#### Background:

Infected food employees are the source of contamination in approximately one in five foodborne disease outbreaks reported in the United States with a bacterial or viral cause.<sup>1</sup> Most of these outbreaks involve enteric, i.e., fecal-oral agents. These are organisms that employees were shedding in their stools at the time the food was prepared. Because of poor or nonexistent handwashing procedures, workers spread these organisms to the food. In addition, infected cuts, burns, or boils on hands can also result in contamination of food. Viral, bacterial, and parasitic agents can be involved.

Traditionally, food regulations have required two methods of preventing the spread of foodborne disease by this mode of transfer, i.e., they have prohibited food workers from preparing food when they are infectious and have required thorough and frequent handwashing. In order to strengthen fecal-oral transmission interventions, the Food Code provides focused and specific guidance about ill workers and when handwashing must occur. As a final barrier, bare-hand contact with ready-to-eat food (i.e., food that is edible without washing or is not subsequently subjected to a pathogen kill step) is prohibited and suitable utensils such as spatulas, tongs, single-use gloves, or dispensing equipment are required to be used. Any alternative to this requirement must convincingly address how food employees will be managed to preclude food contamination and how management will ensure that thorough handwashing occurs after employees use the toilet.

#### Objective:

The objective of this guidance is to provide clarification to & 3-301.11(B) of the Food Code regarding the statement "except when otherwise approved." This guidance is provided to assist the regulatory authority in evaluating conformity with the principle of no bare-hand contact through alternative practices and procedures. In this guidance, Ahazard@ means infected food workers spreading pathogens to food via the hands.

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<sup>1</sup>Based on CDC Summary Surveillance for Foodborne-Disease Outbreaks - United States, 1988-1992 and New York State Department of Health data 1980-1991 published: Weingold, Guzewich, Fudala, 1994, Use of Foodborne Disease Data for HACCP Risk Assessment. J. Food Prot. 53: 820-830.

## Guidance:

I. **Requirements prerequisite** to consideration of alternatives include compliance with all Food Code provisions, particularly those related to:

(A) **Demonstration of Knowledge** - specifically §§ 2-102.11(A), (B), (C), and (H);

(B) **Duties of the Person in Charge** - specifically § 2-103.11(D);

(C) **Employee Health** regarding:

(1) **Reporting of diseases and medical conditions**, and

(2) **Exclusions and restrictions**, i.e., that food employees (including applicants to whom a conditional offer of employment has been made) report their health status as specified in Section 2-201.11; ill food employees are restricted or excluded as specified in Section 2-201.12; and the exclusions and restrictions are removed as specified in Section 2-201.13;

(D) **Personal Cleanliness, i.e., handwashing** procedures, including frequency and methodology of handwashing that ensure food employees keep their hands and fingertips clean and handwashing occurs at the times specified in Section 2-301.14 - including after using the toilet and between tasks that may re-contaminate the hands; and

(E) **Hygienic Practices** as specified in Part 2-4.

II. FDA recommends that the **acceptability of an alternative** to no bare-hand contact **should be based on** evidence that at least the following are addressed:

(A) **Why the operator of the food establishment is unable to comply** with the Code requirement in § 3-301.11(B);

(B) **How the alternative practices and procedures will control the hazard through an active managerial control program**. Such a program includes monitoring and verifying the institution of the prerequisite requirements described in Part I above and satisfies the following:

(1) **The public health hazard** associated with bare-hand contact specific to the food establishment operation **is identified and understood**. The regulatory authority needs assurance that the permit holder recognizes that the hazard being addressed is the possible contamination of ready-to-eat food by viral and parasitic as well as bacterial pathogens that are transferred from employee's hands.

(2) The ready-to-eat foods that will be contacted with bare hands are identified and both **procedures and practices** are in place so that **food employees wash their hands** before returning to their workstation and **cross-contamination** from touching raw and ready-to-eat food **is precluded**.

*For example, identifying the specific type of food to be prepared, such as tacos, and the specific location, such as a situation where a food employee is assigned solely to the designated taco workstation. The workstation is located immediately adjacent to the taco assembly unit and the employee will be preparing only the specified ready-to-eat food using bare hands.*

*Another example could be a food employee who is responsible solely for assembling a variety of ready-to-eat foods.*

(3) Institution of an **effective training program for food employees** which emphasizes **not working when ill** with any of the symptoms of foodborne illness, and explains **good hygienic practices, proper handwashing** procedures, and **safe food preparation** procedures. This should include a documented training plan that specifies how **management responsibility for training** has been designated, training program content, and the frequency of administration including periodic refresher sessions.

(C) The alternative should clearly include **monitoring, documentation, and verification** to ensure that the practices and procedures are followed. **Corrective actions need to be predetermined** for situations where the practices and procedures are not followed, e.g., an ill employee is found preparing foods.

III. **Documentation of the practices, procedures, and corrective actions** related to an alternative to no bare-hand contact with ready-to-eat food needs to be maintained and readily available at the food establishment at all times for use by the person-in-charge and for review by the regulatory authority.

IV. The regulatory authority should also consider industry's *elective* use, managerial control, and monitoring and verification of additional preventive measures used in tandem with the aforementioned interventions which could include one or more of the following:

(A) Vaccination against hepatitis A for food employees including initial and booster shots or medical evidence that a food employee has had a previous illness from hepatitis A virus;

(B) Double handwashing;

(C) Use of nail brushes;

(D) Use of an FDA-accepted hand sanitizer after handwashing, i.e., approved as safe for application to human skin and safe as an indirect food additive, or exempted as a food additive under 21 CFR 170.39 Threshold of Regulation for Substances Used in Food Contact Articles; and

(E) Motivation for food employees not to work when they are ill.

## Michigan Department of Agriculture Food and Dairy Division

### A GUIDE TO DEVELOPING A WRITTEN ALTERNATIVE PRACTICE AND PROCEDURE FOR BARE-HAND CONTACT WITH READY-TO-EAT FOODS

This draft document is for educational purposes only and should not be considered a replacement to reading the Food Code and Michigan Food Law of 2000, copies of which are available at [www.mda.state.mi.us](http://www.mda.state.mi.us)

#### Background

A person's hands can contain harmful bacteria and viruses that may cause foods to be unsafe to eat. Therefore, it is very important to reduce bare-hand contact with foods that are ready-to-eat (RTE), since these foods will not be cooked, washed or have any additional preparation, before being eaten by your customers. Consequently, the safety of a RTE food is controlled by the person, or persons, who prepare and handle that food before it is served.

The Michigan Food Law of 2000 prohibits bare-hand contact with ready-to-eat foods (see § 3-301.11, *Food Code*). However, a license holder may implement an alternative practice and procedure that allows bare-hand contact under controlled circumstances. Section 6151 of the Food Law of 2000 specifies the requirements for such an alternative procedure. In general, management must implement very specific alternative practices and procedures required by section 6151, and develop a written plan documenting their alternative procedures.

#### What is this guide designed to do?

The purpose of this guide is to provide a step-by-step explanation on developing a written Alternative Practice and Procedure (APP), if you plan to handle RTE foods with bare hands. By reading this guide, you will learn the steps that must be followed to develop an effective APP. These steps include:

- 1) Evaluating alternatives to bare-hand contact and documenting the reasons why they are impractical.
- 2) Documenting consistent compliance with critical requirements of the Food Code.
- 3) Identifying specific work areas where RTE foods will be handled with bare hands.
- 4) Identifying employee positions where RTE foods will be handled with bare hands.
- 5) Identifying the food preparation steps where RTE foods will be handled with bare hands.
- 6) Training new and existing employees, that will handle RTE foods with bare hands, about proper hand washing, the dangers of cross-contamination, and general sanitation.
- 7) Ensuring that hands are washed when necessary.

- 8) Monitor employee health -- ensuring that RTE foods are not handled by employees who are infected with disease-causing microorganisms that could be transferred through foods and food contact surfaces.
- 9) Describing how your establishment will monitor employees to ensure that correct food handling procedures are followed, as well as what to do if a RTE food becomes contaminated. Monitoring employees to ensure that the practices and procedures are being followed.
- 10) Periodic review of operations and the alternative practices and procedures. Maintaining and updating your APP records so that the procedures are always useful to your establishment and staff. This includes a minimum of at least one documented annual review of your APP.

Now, let's look at the individual steps that are involved in producing an APP to handle RTE foods with bare hands. Our example will be the preparation of a chef salad.

#### **Step 1: Evaluate Alternatives to Bare-Hand Contact.**

- ~ State what alternatives to bare-hand contact were considered.
- ~ List the specific reasons why the alternatives were judged to be impractical in the facility.

#### **Step 2: Document Consistent Compliance with Critical Requirements.**

- ~ Attach copies of last three inspection reports documenting consistent compliance with 1999 Food Code requirements or equivalent provisions of previous laws.

#### **Step 3: Identify Specific Work Areas Where RTE Foods Will Be Handled With Bare Hands.**

- ~ Look at your menu and identify each recipe where you want to handle RTE foods with bare hands.
- ~ Determine the workstation where the RTE food will be handled with bare hands. (\*Remember, a RTE food is one that will not be cooked, washed or receive any additional preparation before being served to your customers.)

APP Example: You review your recipe and determine that a Chef Salad is a RTE food. The food preparation step and

station where hands will be used are: assembling the ingredients of the Chef Salad on the cook line

#### Step #4 Identify the Employee Positions That Will Be Handling RTE Food with Bare Hands

- ~ Determine which of your staff will be handling the RTE foods with bare hands.
- ~ List the title(s) of the employee positions where RTE foods will be handled with bare hands.

APP Example: A Line Cook will be assembling the Chef Salad.

#### Step #5 Identify the Food Preparation Processes Where Bare Hands Will Be Used

- ~ Look at your recipe and list the steps that involve the use of bare hands.

APP Example: The preparation steps where the Chef Salad will be handled with bare hands are: placing precut cucumber, lettuce, cheese, tomato, cooked ham and cooked chicken in an individual salad bowl.

At this point, you have indicated 1) which RTE foods will have bare-hand contact, 2) where they will be handled, 3) who will handle the foods, and 4) how the foods will be handled.

Now you need to document a food safety training program that will result in your employees knowing how to safely use bare hands with foods.

#### Step #6 Practice and Document Your Food Safety Training Program

- ~ Plan, practice and document that a food safety training plan is in place for all of your employees that will be handling RTE foods with their bare hands. These resources should teach personal hygiene, how to prevent cross-contamination, proper food storage, thawing, cooking, hot holding, re-heating, and sanitation of food equipment, utensils, and food preparation surfaces.

APP Example: Document that each employee will be trained with accepted food safety training resources, such as videos or manuals. Have a signed written record that each employee has received and understood the food safety training.

#### Step #7 Ensure That Employees Wash Hands Whenever Necessary and Use Other Preventative Measures

- ~ Train all employees in proper hand washing techniques.
- ~ Train employees in the proper use of an approved hand sanitizer or any other elective preventative measures used.

Example: Your APP states that you demonstrate proper hand washing techniques to each employee that will handle RTE foods. You also record observation of the employee to see if they wash and sanitize hands correctly, perhaps making spot checks every hour.

#### Step #8 Monitor Employee Health Status to Reduce Transmission of Foodborne Illness

- ~ Observe your employees to determine whether they may be infected with harmful organisms that could be transmitted by food handling activity.

~ Employees cannot handle foods, clean equipment, utensils or linens, or unwrapped single service articles if they have been diagnosed with *Salmonella typhi*, *Shigella*, *E. coli* 0157:H7 or Hepatitis A virus, or show symptoms such as diarrhea, fever, vomiting, jaundice or sore throat with fever, or have a persistent cough, sneezing or runny nose. Boils and infected wounds must be protected and covered.

APP Example: Put statements in your APP plan explaining how you will observe and recognize the signs of diseases that could be transmitted by infected employees through RTE foods.

#### Step #9 Provide Documentation That You Monitor Employees While They Handle Food With Bare Hands, and That You Have Alternative Procedures When Foods Become Contaminated

- ~ Determine the best way for you to monitor your employees. Monitoring methods may include hand wash logs or automatic counters.

- ~ Create written plans of action that will be taken when foods or hands become contaminated. If a RTE food is improperly handled, then you must take corrective action, such as

- re-training the employee,
- discarding the contaminated food,
- using sanitary gloves, and/or
- excluding or restricting ill employees.

- ~ Document your corrective actions.

APP Example: Your APP describes how and when you monitor employees, and what you do when they contaminate their hands or RTE foods.

#### Step #10 Document When You Will Update Your APP Plan

- ~ Recognize that your recipes may change, and that you may need to change various parts of your APP plan whenever necessary.

APP Example: Document when you plan to review your APP plan (at least once per year), and keep the entire APP plan available for review by your establishment and staff.